

**Fill in this information to identify the case:**

Debtor 1 Mark A. Benner

Debtor 2 Diane M. Benner  
(Spouse, if filing)

United States Bankruptcy Court for the: MIDDLE District of Pennsylvania  
(State)

Case Number 5:15-bk-00039-RNO

**Form 4100R****Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

**Part 1: Mortgage Information**

Name of creditor: Wells Fargo Bank, N.A. Court Claim No. (if known): 3

Last 4 digits of any number you use to identify the debtor's account: 6742

Property Address 210 Scenic View Road  
Number Street

Lehighington, PA 18235  
City State ZIP Code

**Part 2: Prepetition Default Payments****Check one:**

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \_\_\_\_\_

**Part 3: Postpetition Mortgage Payment****Check one:**

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: **March 1, 2020**

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total postpetition ongoing payments due: (a) \$0.00

b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$0.00

c. **Total.** Add lines a and b. (c) \$0.00

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

Debtor 1	Mark A. Benner		Case number (if known)	5:15-bk-00039-RNO
	First name	Middle Name	Last name	

#### Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

#### Part 5: Sign Here

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim**

Check the appropriate box:

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

/s/ Jerome Blank, Esquire Date February 28, 2020  
Signature

Print Jerome Blank, Esq., Id. No.49736 Title Attorney for Plaintiff  
First Name Middle Name Last Name

Company Phelan Hallinan Diamond & Jones, LLP

**If different from the notice address listed on the proof of claim to which this response applies:**

Address 1617 JFK Boulevard, Suite 1400, One Penn Center Plaza  
Number Street

Philadelphia, PA 19103  
City State ZIP Code

Contact Phone 215-563-7000 Email jerome.blank@phelanhallinan.com

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	
<b>Mark A. Benner</b>	:	<b>BK. No. 5:15-bk-00039-RNO</b>
<b>Diane M. Benner</b>	:	
	:	
<b>Debtors</b>	:	<b>Chapter No. 13</b>
	:	
<b>Wells Fargo Bank, N.A.</b>	:	
	:	
<b>Movant</b>	:	
v.	:	
<b>Mark A. Benner</b>	:	<b>11 U.S.C. §362</b>
<b>Diane M. Benner</b>	:	
	:	
<b>Respondents</b>	:	
	:	

**CERTIFICATE OF SERVICE OF RESPONSE TO  
NOTICE OF FINAL CURE PAYMENT**

I certify under penalty of perjury that I served or caused to be served the above captioned Response to Notice of Final Cure Payment on the parties at the addresses shown below or on the attached list on February 28, 2020.

The types of service made on the parties were: Electronic Notification and First Class Mail.

Service by Electronic Notification

Charles J. Dehart, III, Esquire (TRUSTEE)  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

JASON M. RAPA, Esquire  
141 SOUTH 1ST STREET  
LEHIGHTON, PA 18235

United States Trustee  
228 Walnut Street, Suite 1190  
Harrisburg, PA 17108

Service by First Class Mail

Mark A. Benner  
210 Scenic View Lane  
Lehigh, PA 18235-9167

Diane M. Benner  
210 Scenic View Lane  
Lehigh, PA 18235

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification" and those served by mail will be listed under the heading: Service by First Class Mail."

/s/ Jerome Blank, Esquire  
Jerome Blank, Esq., Id. No.49736  
Phelan Hallinan Diamond & Jones, LLP  
1617 JFK Boulevard, Suite 1400  
One Penn Center Plaza  
Philadelphia, PA 19103  
Phone Number: 215-563-7000 Ext 31625  
Fax Number: 215-568-7616  
Email: jerome.blank@phelanhallinan.com

February 28, 2020